

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE: PHILIPS RECALLED CPAP, BI-
LEVEL PAP, AND MECHANICAL
VENTILATOR PRODUCTS
LITIGATION

Master Docket: Misc. No. 21-mc-1230-JFC

MDL No. 3014

This Document Relates to:
All Actions Asserting Claims for Medical
Monitoring

**DECLARATION OF JASON WOLF OF WOLF GLOBAL COMPLIANCE
RE: MEDICAL ADVANCEMENT PROGRAM**

I, Jason Wolf, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I have personal knowledge of the matters stated in this Declaration.
2. I am the founder of Wolf Global Compliance, LLC (“WGC”). For over 20 years, I have pioneered and advanced healthcare compliance in personal injury mass tort litigations. My curriculum vitae is attached hereto as Exhibit “1” and an Overview of WGC is attached hereto as Exhibit “2.”
3. WGC has subject matter expertise in advising on settlement administration and implementing litigation solutions, specializing in healthcare lien compliance and resolution and designing and executing medical monitoring programs. WGC’s Healthcare Compliance, Medical Monitoring, and Administration experience include serving in many high-profile exposure and medical device matters including World Trade Center, Deepwater Horizon, Fire Victim Trust, National Football League, NCAA, Guidant, Medtronic, Transvaginal Mesh and Respironics Economic Payer.

4. WGC has designed and operationalized the most complex medical monitoring solutions utilized in the physical harm mass tort settlement community. Medical monitoring programs have many design and delivery features including compliant healthcare coordination of benefits, exacting medical encounter parameters, screening and credentialing of provider networks, cost containment, confidential and secure benefit delivery, program efficacy reporting, grant submission and oversight, online resource center ensuring access, and understanding of the benefit and relevant materials. Each program is unique in its success criteria, yet core tenets of WGC programs include improving access to healthcare, design that promotes benefit utilization, benefit recipient focused tools, and ensuring that quality and trustworthy healthcare is available.

5. I have been appointed (as part of organizations I have led) by numerous parties and federal and state courts to serve as a Claims Administrator, Lien Resolution Administrator or Healthcare Compliance Neutral to provide settlement services in a broad variety of national mass tort and class action matters, including several multidistrict litigations (“MDLs”).

6. Below is a representative list of matters in which I have led the program design and administration:

- *In re World Trade Center Disaster Site Litigation*, MDL Docket Nos. MC100, 102-03 (S.D.N.Y.), where I led the design and execution of the Healthcare Compliance obligations associated with claims asserted against the World Trade Center Captive Insurance Company, Inc. relating to the September 11th Consolidated Cases.
- *Deepwater Horizon Litigation*, MDL 2179 (E.D. La.), where I designed and implemented the Medical Benefits Settlement as Claims Administrator and Lien Resolution Administrator, designed and implemented a 21-year periodic medical

evaluation program that involved over 22,000 eligible class members entitled to claim compensation and/or medical consultation services.

- *National Football League Players' Concussion Injury Litigation*, MDL 2323 (E.D. Pa.), where I designed and implemented a medical evaluation program comprised of a national network of medical service providers who provided baseline assessments of neurocognitive function and follow-up care for an estimated 17,000 players over 10+ years.
- *Vioxx Product Liability Litigation*, MDL Docket No. 1657 (E.D. La.), where I served as the Lien Resolution Administrator tasked with resolving health care reimbursement claims (or "liens") asserted against over 10,000 claimants by Centers for Medicare & Medicaid Services ("CMS"), all 53 state and territory Medicaid agencies; and several other governmental healthcare payers, such as the Veterans Affairs, TRICARE, and Indian Health Services.

7. I have reviewed the proposed class settlement of Medical Monitoring Claims in the above-captioned matter, dated May 9, 2024.

8. I declare that I am experienced, qualified, and ready to serve as the Settlement Administrator responsible for the provisions of Medical Advancement Program Benefits, including MAP Research, MAP Registry, and MAP Resources to the proposed Settlement Class.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: May 10, 2024

A handwritten signature in black ink, appearing to read "Jason Wolf", written over a horizontal line.

Jason Wolf

EXHIBIT

“1”

Jason Wolf
Wolf Global Compliance, LLC

Contact:

Phone: (704) 906-1122

Email: jason@wolfglobalcompliance.com

Address: 229 S. Brevard, Suite 300, Charlotte, NC 28202

SUMMARY

Jason Wolf is a distinguished professional renowned for resolving complex administrative challenges within high-profile physical harm and emotional distress settlement programs. With extensive experience in healthcare compliance, he has built strong partnerships with federal (Medicare, Veterans Affairs, TRICARE, and Indian Health Services) and state healthcare agencies, private healthcare plans, and third-party recovery contractors, facilitating fair and efficient agreements in numerous aggregate settlements. His expertise extends to operational design and management, particularly in pioneering medical monitoring and grant administration within mass tort settlements.

PROFESSIONAL EXPERIENCE

Wolf Global Compliance, LLC (“WGC”)

Founder & CEO | January 2024 - Present

Founded WGC to provide specialized healthcare compliance services to the mass tort litigation and settlement community, elevating industry standards in healthcare compliance and medical monitoring. WGC leverages its unmatched expertise in identifying and fulfilling healthcare repayment obligations, effectively mitigating liabilities for plaintiffs, plaintiff’s counsel, and defense. Committed to elevating industry standards, WGC has set the benchmark in Healthcare Compliance and Medical Monitoring.

Wolf/Garretson, LLC (“W/G”)

Healthcare Compliance Consultant | January 2022 – January 2024

Provided design and administrative oversight services in healthcare compliance for the mass tort industry.

The Garretson Resolution Group, Inc (“GRG”)

Co-Founder & President | January 2003 – December 2018

Co-founded GRG, a leading provider of comprehensive settlement administration services in mass tort settlements. Guided the company through two successful private equity transactions before its acquisition by Epiq in 2019.

Signal Interactive

Co-Founder |

Co-founded Signal Interactive Media, dedicated to enhancing class notice efficacy through contemporary data analytics and mass media.

Legal and Healthcare Conferences

Regular speaker at legal and healthcare conferences, sharing insights and expertise with industry professionals.

PROGRAMMATIC EXPERIENCE

Leadership Role in Administrative Design & Execution

World Trade Center Disaster Site Litigation | MDL Docket MC100, MC102 and MC103 | United States District Court, Southern District of New York | Judge Alvin K. Hellerstein

3M Combat Arms Earplug Products Liability Litigation | MDL 2885 | United States District Court, Northern District of Florida | Judge M. Casey Rodgers

Deepwater Horizon Litigation | MDL 2179 | United States District Court, Eastern District Louisiana | Judge Carl A. Barbier

National Football League Players' Concussion Injury Litigation | MDL 2323 | United States District Court, Eastern District of Pennsylvania | Judge James A. Byrne

Zyprexa Products Liability Litigation | MDL 1596 | United States District Court, Eastern District of New York | Judge Jack B. Weinstein

Actos Products Liability Litigation | MDL 2299 | United States District Court, Western District of Louisiana | Judge Terry A. Doughty

Vioxx Products Liability Litigation | MDL 1657 | United States District Court, Eastern District of Louisiana | Judge Eldon E. Fallon

Fire Victim Trust | U.S. Bankruptcy Court for the Northern District of California | Judge Dennis Montali | Trustee, Cathy Yanni

Philips Recalled CPAP Economic Loss Settlement | MDL 3014 | United States District Court, Western District of Pennsylvania | Judge Joy Flowers Conti

EDUCATION

Graduate Degree | Master of Arts and Sciences | Communication
Eastern Michigan University

Undergraduate Degree | Bachelor of Science | Communication
Eastern Michigan University

PERSONAL

Brooklyn Collective CLT | January 2020 - Present

Founder & Board Member

Founded and sits on the board of the Brooklyn Collective CLT, a nonprofit promoting inclusivity and upward mobility in the Charlotte region.

NXT CLT | January 2021 – December 2022

Board Member

Served on the board of NXT CLT, a nonprofit supporting businesses owned by people of color.

Gratitude @ Work |

Board Member

Board member of Gratitude @ Work, a nonprofit dedicated to empowering individuals who have experienced physical or emotional trauma.

EXHIBIT

“2”

Respironics CPAP Settlement Programs Healthcare Compliance Neutral (HCN)

Prepared By:

Jason Wolf
Wolf Global Compliance LLC
HCN Design & Oversight

OVERVIEW

Wolf Global Compliance (“WGC”) WGC has spent 20 years pioneering and advancing healthcare compliance in personal injury mass tort litigations. WGC has subject matter expertise in advising on settlement administration and implementing litigation solutions, specializing in healthcare lien compliance and resolution (“resolving liens”) and designing and executing medical monitoring programs.

WGC has worked closely with Centers for Medicare & Medicaid Services (“CMS”), state Medicaid agencies, all other governmental healthcare payers and private health insurance providers.

WGC’s Healthcare Compliance, Medical Monitoring, and Administration experience include serving in many high-profile exposure and medical device matters including World Trade Center, Deepwater Horizon, Fire Victim Trust, National Football League, NCAA, Guidant, Medtronic, Transvaginal Mesh and Respironics Economic Payer.

HEALTHCARE COMPLIANCE

WGC pioneered Healthcare Compliance standards and services for physical harm and emotion distress mass tort litigations. WGC collaborates with parties and creates a strategic approach which ensures compliance and delivers favourable results in terms of both time and outcomes. WGC then engages healthcare and recovery agencies to coordinate a unified, accurate, and predictable approach and obtain agency consent for resolution pathways. Finally, WGC oversees the processing of Healthcare Compliance Program by developing the necessary procedures and protocols to enable the efficient and transparent administration of the compliance requirements for all key stakeholders.

MEDICAL MONITORING

WGC has designed and operationalized the most complex medical monitoring solutions utilized in the physical harm mass tort settlement community. Medical monitoring programs have many design and delivery features including compliant healthcare coordination of benefits, exacting medical encounter parameters, screening and credentialing of providers network, cost containment, confidential and secure benefit delivery, program efficacy reporting, grant submission and oversight, online resource center ensuring access, and understanding of the benefit and relevant materials. Each program is unique in its success criteria, yet core tenets of WGC program include improving access to healthcare, design that promotes benefit utilization, benefit recipient focused tools, and ensuring quality and trustworthy healthcare is available.

ABOUT

Prior to WGC, Jason Wolf co-founded The Garretson Resolution Group (“GRG”) along with Matt Garretson. Wolf is recognized as having solved for some of the most complex administrative issues in high scale, high profile, and demanding settlement programs. Wolf’s role in building strong business relationships with federal, state, and military healthcare agencies, private healthcare plans and third-party recovery contractors. Wolf led GRG’s success in facilitating fair agreements among interested stakeholders in 100’s of aggregate settlements. Similarly, his operational design and management acumen were instrumental to pioneering the field of medical monitoring (programs in use today for both the cleanup workers in BP Oil Spill and retired players in the National Football League).

Wolf is a frequent speaker at legal and healthcare organizations and conferences. Jason earned both his undergraduate and graduate degrees from Eastern Michigan University.

EXHIBIT A

World Trade Center Disaster Site Litigation | MDL Docket MC100, MC102 and MC103 | United States District Court, Southern District of New York | Judge Alvin K. Hellerstein



3M Combat Arms Earplug Products Liability Litigation | MDL 2885 | United States District Court, Northern District of Florida | Judge M. Casey Rodgers



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